

EXHIBIT A

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COUNSEL FOR PETITIONER
 WEIHAI TEXTILE GROUP IMPORT & EXPORT CO. LTD.

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

WEIHAI TEXTILE GROUP IMPORT & EXPORT)
 CO., LTD.,)

Petitioner,)

v.)

ERUPTION HOLDINGS, INC.,)

Respondent.)

Case No. 2:21-mc-00147-SWS

**DECLARATION OF YING LIU IN SUPPORT OF WEIHAI TEXTILE GROUP
 IMPORT & EXPORT CO., LTD.'S MOTION FOR LEAVE TO CONDUCT LIMITED
 DISCOVERY**



I, Ying Liu, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am the manager of Weihai Textile Group Import & Export Co., Ltd.'s ("Weihai") risk control department. Unless otherwise indicated, I have personal knowledge of the facts set forth below, and if called upon as a witness, I could and would competently testify under oath to the matters set forth herein. To the extent I do not have personal knowledge of a fact set forth below, my knowledge is based on consultation with persons and the type and kind of information I regularly rely on in matters such as these.

2. I am familiar with Weihai's dealings with Eruption Holdings, Inc., including the sales contracts 300118ERUP02Y, 300118ERUP03Y, 300118ERUP04Y, 300118ERUP05Y, 300118ERUP06Y, and 300118ERUP07Y, the arbitration before an arbitral tribunal of the China International Economic and Trade Arbitration Commission ("CIETAC"), and the events leading up to the instant proceeding. My responsibility in connection with these dealings was to pursue the outstanding payments owed under the sales contracts listed above.

3. In mid-2018, Yun (York) Liu ("Liu") introduced Francis Liang ("Liang") to Weihai. Liu was a personal acquaintance of Tao (Elain) Yang ("Yang"), an employee of Weihai at the time, now former employee. In performing my duties as manager of Weihai's risk control department, I received reports from colleagues who were responsible for interviewing Yang about the events that gave rise to the CIETAC arbitration and to this action. Yang informed me that, before returning to China, Liu worked in the United States and that, at one point, he and Liang worked for the same company. Yang also informed me that Liang left that company to work for Eruption sometime after Liu left the United States for China. Yang also informed me that, at all times during his dealings with Weihai, Liang held himself out as the person responsible for Eruption's business operations.

4. Yang was responsible for communicating with Liu and Liang on behalf of Weihai for the business with Eruption. Yang no longer works at Weihai. However, her email communications with Liang and John Legge (“Legge”) remain on Weihai’s email server. Annexed hereto are true and correct copies of the following documents retrieved from Weihai’s email server:

Exhibit 1: Emails between Liang and Yang from August 1 to August 10, 2018, and the attachments to Liang’s August 10, 2018 email;

Exhibit 2: Emails between Liang and Yang from October 12 to November 9, 2018;

Exhibit 3: Emails between Liang and Yang from November 21 to December 1, 2018;

Exhibit 4: Liang’s December 13, 2018 email to Yang and its attachment;

Exhibit 5: Emails between Liang and Yang on December 13, 2018;

Exhibit 6: Emails between Liang and Yang from December 13 to December 22, 2018;

Exhibit 7: Emails between Liang and Yang on December 25, 2018;

Exhibit 8: Yang’s December 28, 2018 email to Liang;

Exhibit 9: Liang’s reply to Yang’s December 27, 2018 email; and

Exhibit 10: Yang’s and Ning Cong’s emails to Legge on November 17, 2020, March 24, 2021, and April 15, 2021 respectively.

5. Also annexed hereto are true and correct copies of the following documents provided by Weihai’s insurer, China Export & Credit Insurance Corporation, in connection with its investigation of the events that gave rise to the CIETAC arbitration and to this action:

Exhibit 11: Emails between Brown & Joseph, LLC (“B&J”) and Legge from May 10 to 23, 2019; and

Exhibit 12: Emails between B&J and Legge from May 10 to 22, 2019.

I declare under penalty of perjury under the laws of the United States of America and the State of Wyoming that the foregoing is true and correct.

Executed on September 8, 2021, in Weihai, People's Republic of China.



I hereby certify that this is a true and accurate translation of the original document.

a) Translator's Name: Li Jingyi

b) Qualification: CATTI (China Accreditation Test for Translators and Interpreters)
Level 2 Translator

c) CATTI Certificate No.: 201811009370000417

d) Personal Mobile Phone Number: +86 15900502618

e) Organization where the translator works: Shanghai Yixinxiangshan
Translation Service Co., Ltd.

f) Organization Address: Room 3111, China Merchants Plaza (Shanghai), No. 333
North Chengdu Road, Jing'an District, Shanghai

g) Organization Telephone Number: +86 21 51708516

h) Signature: 

i) Date: September 8, 2021



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葛焱 (特殊执业许可)
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请愿人律师
 威海纺织集团进出口有限责任公司

美利坚合众国怀俄明州
 联邦地方法院

威海纺织集团进出口有限责任公司)

请愿人)

与)

ERUPTION HOLDINGS, INC.,)

答辩人)

案件编号 2: 21-mc-00147-SWS

刘影关于支持威海纺织集团进出口有限责任公司有限证据开示动议的声明



我，刘影，根据美国法典第28卷第1746条声明如下：

1.本人是威海纺织集团进出口有限责任公司（以下简称“威海”）风控部经理。除非另有说明，本人亲自了解以下所列事实，如果被传唤为证人，本人可以并将有能力对以下所列事项宣誓作证。就下述我本人并不亲自了解的事实而言，我的知识是基于与他人的沟通以及我在此类问题上通常所依据的信息。

2.我熟悉威海与 Eruption Holdings, Inc.的交易往来，包括销售合同 300118ERUP02Y、300118ERUP03Y、300118ERUP04Y、300118ERUP05Y、300118ERUP06Y、300118ERUP07Y，在中国国际经济贸易仲裁委员会（以下简称“CIETAC”）仲裁庭进行的仲裁，以及导致本程序的事件。我在这些交易中的责任即是追讨上述销售合同下的未付款。

3.2018年年中，Yun(York) Liu(以下简称“Liu”)将Francis Liang(以下简称“Liang”)介绍到威海。Liu是时任威海员工、现为前员工的Tao (Elain) Yang (以下简称“Yang”)的熟人。在履行威海风控部经理职责的过程中，我收到了负责采访Yang的同事关于导致CIETAC仲裁和本次诉讼的事件的报告。Yang告诉我，在回国之前，Liu在美国工作，他曾一度 and Liang在同一家公司工作。Yang还告诉我，在Liu离开美国前往中国后的某个时候，Liang离开了那家公司为Eruption工作。Yang还告诉我，在Liang与威海交易时，他一直都声称自己是Eruption业务运营的负责人。

4.Yang负责代表威海就Eruption的业务与Liu、Liang进行沟通。Yang不再在威海工作。然而，她与Liang和John Legge (以下简称“Legge”)的电子邮件往来仍保留在威海的电子邮件服务器上。随函附上从威海电子邮件服务器中检索到的下列文件的真实、正确副本：

文件 1: 2018年8月1日至8月10日 Liang和Yang之间的电子邮件, 以及2018年8月10日发至Liang的电子邮件的附件;

文件 2: 2018年10月12日至11月9日 Liang和Yang之间的电子邮件;

文件 3: 2018年11月21日至12月1日 Liang和Yang之间的电子邮件;

文件 4: 2018年12月13日 Liang发至Yang的电子邮件及其附件;

文件 5: 2018年12月13日 Liang和Yang之间的电子邮件;

文件 6: 2018年12月13日至12月22日 Liang和Yang之间的电子邮件;

文件 7: 2018年12月25日 Liang和Yang之间的电子邮件;

文件 8: 2018年12月28日 Yang发至Liang的电子邮件;

文件 9: 2018年12月27日 Liang对于Yang的电子邮件的回复; 以及

文件 10: 2020年11月17日、2021年3月24日和2021年4月15日 Yang和Ning Cong分别发给 Legge 的电子邮件。

5.同时附上威海的保险公司中国出口信用保险公司在调查导致CIETAC仲裁和本次

诉讼的事件时产生的下列文件的真实、正确副本:

文件 11: 2019年5月10日至23日 Brown & Joseph, LLC (以下简称“B&J”) 与 Legge 之间的电子邮件; 以及

文件 12: 2019年5月10日至22日 B&J 和 Legge 之间的电子邮件。

我声明上述内容是真实和正确的, 并遵守美利坚合众国和怀俄明州关于伪证罪处罚

的法律。

于2021年9月8日在中华人民共和国威海市签署。

刘景

2021.9.8



EXHIBIT 1

2021/9/1

打印邮件

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主 题:	RE: Sales Contract	
发件人:	Francis <francis@eruptioninc.com>	2018-8-10 5:37:15
收件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	
抄 送:	cylu70@126.com, york@feimanngroup.com	
附 件:	300118ERUP01Y.pdf Eruption.Auth.pdf	

Hi Elain,

Please see the attached signed sales contract and Letter of Authorization. York will work with you and your company and follow up the contracts in detail on our behalf. Please do not hesitate to contact me should you need further assistance.

I look forward to building up a solid business relationship with your esteemed company in the upcoming future.

Francis/Eruption

From: 迪尚智能制造中心 杨涛 <elain.yang@dishang.com>

Sent: Monday, August 6, 2018 2:03 AM

To: Francis <francis@eruptioninc.com>

Cc: cylu70@126.com; york@feimanngroup.com

Subject: Re: Re: Contract# ERP180801

Hi Francis,

As contact with York ,on the principle of friendly cooperation,we have amended the contract .pls see the attachment for the new sales contract .pls seal and sign ,then send back to me .

My office address as below:

WeiHai DiShang Garment Intelligent Manufacturing Co.,LTD

No.23 HengRui Street,Hig-Tech Zone, Weihai,Shandong,China,264209

tel: +86-631-5655381

Moblie phone: 18206314566

2021/9/1

打印邮件

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-----原始邮件-----

发件人: Francis <francis@eruptioninc.com>**发送时间:** 2018-08-01 08:54:05 (星期三)**收件人:** cylu70@126.com, elain.yang@dishang.com**抄送:** york@feimanngroup.com**主题:** Re: Contract# ERP180801

Dear Elain,

Please see the attached contract.

Thank you,

Francis/Eruption

626-297-8689

 Virus-free. www.avast.com

威海纺织集团进出口有限责任公司
WEIHAI TEXTILE GROUP IMPORT AND EXPORT CO.,LTD
 NO.16 SHICHANG AVENUE, WEIHAI, 264200 CHINA

TEL: +86-631-5655381
 FAX: +86-631-5658088

销售合同 / SALES CONTRACT

买方:

BUYER: ERUPTION HOLDINGS INC.

CONTRACT 300118ERUP01Y

TEL: 307-222-8069

DATE: 2018/8/2

FAX: 307-222-8069

WEIHAI, CHINA

ADD: 1603 CAPITOL AVE SUITE 314-957 CHEYENNE, WY 82001

经双方确认订立本合同, 具体条款如下:

THIS SALES CONTRACT IS MADE OUT AS PER THE FOLLOWING TERMS AND CONDITIONS MUTUALLY CONFIRMED BY BOTH PARTIES

品牌 BRAND	款号 STYLE NO.	颜色 COLOR	款式描述 DESCRIPTION	数量(条) QTY (PCS)	单价(FOB) UNIT PRICE	金额 AMOUNT	离厂日期 ETD
fashion nova	NMC919C	indigo+paint 靛蓝+喷漆	Men'sdenim jacket 100%cotton 10OZ- 10.5OZ 男款牛仔夹克 全棉10-10.5盎司	1233	\$8.90	\$10,973.70	2018/9/15
fashion nova	NMC919C	black+paint 黑色+喷漆	Men'sdenim jacket 100%cotton 10OZ- 10.5OZ 男款牛仔夹克全 棉10-10.5盎司	927	\$8.90	\$8,250.30	2018/9/15
fashion nova	NMC010B	bleach 漂洗色	Men'sdenim jacket 100%cotton 10OZ- 10.5OZ 男款牛仔夹克全 棉10-10.5盎司	1542	\$8.80	\$13,569.60	2018/9/15
fashion nova	NMC010B	Tinted+Vintage	Men'sdenim jacket 100%cotton 10OZ- 10.5OZ 男款牛仔夹克1 全棉10-10.5盎司	1542	\$8.80	\$13,569.60	2018/9/15
fashion nova	NMC010B	Distressed Grey 深灰	Men'sdenim jacket 100%cotton 10OZ- 10.5OZ 男款牛仔夹克全 棉10-10.5盎司	1233	\$8.80	\$10,850.40	2018/9/15
TOTAL				6477		\$57,213.60	
(允许溢短装 QUANTITY ALLOWANCE +3%)							
总值: TOTAL VALUE:	FIFTY-SEVEN THOUSAND TWO HUNDRED AND THIRTEEN POINT SIXTY U.S. DOLLARS						

如按本合同条款运输工具由买方选订, 卖方将在上述交货日期将货物备好, 送至港口。

If a carrier is selected and booked by the Buyer itself in accordance with the terms of this contract, the seller will have the commodity ready for shipment by such time of delivery.

(1) 装运标记: 按买方要求

(2) 装运口岸: 工厂就近港口

SHIPPING MARK: As buyer require.

LOADING PORT: nearby the factory

(3) 目的口岸: 洛杉矶

DESTINATION PORT: LOS ANGELES

(4) 付款条件: 发货后60天内电汇

PAYMENT: TT after shipment 60days

(5) 包装: 按买方要求配比1-2-2-2-1-1, 每件一袋, 9件一内袋, 18件一箱, 箱规见附件, 单独包装袋, 袋上有要求警语。袋上有白色的信息贴纸。如果对包装其他要求, 买方应征得卖方同意并承担由此增加的一切额外费用。

- Packing:** As buyer required size ratio:S-M-L-XL-2XL-3XL/Ratio: 1-2-2-2-1-1.Inner pack:9pcs case pack:18pcs. carton requirement see attachment.Individually poly-bagged with child suffocation warning printed /Labelled in 5 languages white stickershowing style#,col,size attached to individual polybag and innerpack polybag see attachment.
- 销售方在双方签字合同生效后10天内提供PP样给买方, 每款每色M码2件; 15天内提供TOP样给买方, 每款每色5件, 所提供样衣为有偿提供, 数量并入大货数量。
- (6) 样板确认:** seller need to provide PP samples to buyer in size M for every style/col within 10 days after both sides signed in the contract, 2 pcs each ;and to provide TOP samples to buyer in size M for every style/col within 15 days after both sides signed in the contract, 5 pcs each. All samples are provided for payment. This part will be paid together with the bulk goods.
- Sample approval:**
- (7) 单据:** 卖方只向买方提供以下单据:
a) 海运时, 海运提单; 空运时, 空运单; 铁路运输时, 货物承运单据;
b) 商业发票;
c) 装箱单;
倘若需要其他单据, 如产地证、领事发票等, 卖方可以根据要求提供, 但费用应由买方承担。
- Documents:** The Seller will only provide the Buyer with the following documents for the payment:
a) ocean bill of lading in case of shipment by sea or airway bill in case of shipment by air of cargo receipt in case of shipment by rail;
b) commercial invoice;
c) packing list;
If any additional document, such as certificate of origin, etc, is required, the Seller may provide as requested for the Buyer's account.
- (8) 风险:** 货物的风险在以下时候转移至买方:
a) 海运时在其越过船舷, 摘下挂钩时;
b) 空运时在其移交空运承运人或代理人保管时;
c) 铁路运输时在其已交铁路保管时。
- Risk of loss:** The risk of the commodity shall transfer to the buyer:
a) when it has passed over the rail of the vessel and been released from tackle in case of shipment by sea.
b) when it has been delivered into the custody of the air carrier or agent in case of shipment by air.
c) when it has been delivered into the custody of the railway.
- (9) 品质/数量异议:** 如买方提出异议, 凡属品质异议应于货到目的口岸之日30天内提出, 凡属数量异议应于货到目的口岸之日起15天内提出, 过期不受理。对所装货物所提任何异议属于保险公司、轮船公司、其它有关运输机构或邮递机构所负责者, 卖方不负任何责任。理赔只限于卖方在收到买方所在地声誉良好的商检机构或商会出具的商品抽样检查报告, 证明货物与合同不符后, 对品质不符的货物按一比一更换或按照货物的疵劣程度和损坏的范围将货物贬值, 对数量不符的货物给予补足。无论哪种情况下, 买方均不对货物的可销性或适用性负责, 也不对任何损失赔偿负责包括但又不限于直接的、间接的、附带的损失, 如买方不能在合同规定的期限内将信用证开到或将预付款汇到, 或者开来的信用证不符合合同规定, 而在接到卖方通知后, 不能按期办妥改证, 卖方有权撤销合同或延期交货, 并有权提出索赔。

b
c

Objection to
quality and
quantity

Quality/Quantity Discrepancy: In case of quality discrepancy, claims shall be filed by the Buyer within 30 days after the arrival of the commodity at the port of destination, while for quantity discrepancy, claims shall be filed by the Buyer within 15 days after the arrival of the commodity at the port of destination. Otherwise no claim will be accepted. It is understood that the Seller shall not be liable for any discrepancy of the commodity shipped due to causes for which the insurance company, other transportation organization or post office are liable. The settlement of such claims is restricted to replacement of the non-conforming commodity on a one-to-one basis or devaluation of the commodity according to degree of inferiority and extent of damage in case of quality discrepancy or supply for the shortage in case of quantity discrepancy, after the Seller has received an inspection report on the commodity by sampling issued by a reputable inspection organization or chamber of commerce at the place where the Buyer is located, certifying the non-conformity thereof. In no event shall the Seller be held liable for the merchantability or fitness for any purpose, nor shall it have any liability or responsibility for damages of any kind whatsoever, including but not limited to any direct, indirect or collateral damages. In case the L/C or the advance payment does not reach the Seller within the time stipulated in the Contract or does not correspond to the Contract terms and the Buyer fails to amend its terms within the time limit after being notified by the Seller, the Seller has the right to cancel the Contract or to delay the delivery of the commodity as well as to lodge claims against the Buyer.

(11)不可抗力: 本合同内所述全部或部分货物, 如因不可抗力的原因, 以致不能履约或不得不延期交货, 卖方不负责任。但需向买方提供证明。

Force Majeure: The Seller shall not be held liable for failure or delay in delivery of the entire lot or a portion of the commodity under this Contract in consequence of any force majeure incidents. But the seller must be provide relevant proof to buyer.

(12)仲裁条款: 在执行本合同中所产生的或者与合同有关的一切争执, 由双方协商解决。如果协商后仍不能解决时, 得提请仲裁。仲裁在中国进行, 由中国国际经济贸易仲裁委员会, 根据委员会得仲裁程序暂行规则进行仲裁。仲裁决定为最终决定, 买卖双方都应服从。除仲裁委员会另有决定外, 仲裁费用由败诉一方负担。本合同或与本合同相关的法律纠纷适用中华人民共和国法律, 本合同条款以中文文本为准。

Independent Arbitration Clause: Any or all disputes arising from or in connection with the performance of the Contract shall be settled through negotiation by both parties, failing which they shall be submitted for arbitration. The arbitration shall take place in China and shall be conducted by the China International Economic and Trade Arbitration Commission in accordance with the provisional rules of procedures of the said commission. The arbitration award shall be final and binding upon both Buyer and Seller. Unless otherwise awarded by the said arbitration commission, the arbitration fees shall be borne by the losing party. The Contract and all disputes concerning the contract shall be governed by laws of the People's Republic of China. And Contract in Chinese shall prevail.

(13)其他条款: 买方未付款时, 货权仍然属于卖方所有。

Other Conditions: Before Buyer arrange the payment, the commodity still belong to Seller.

CONTRACTUAL TERMS AGREED BY BOTH SELLER & BUYER (PLEASE SIGN & E-MAIL TO
elain.vang@dishang.com)

买方(BUYER PLEASE SIGN):

卖方(SELLER):

WEIHAI TEXTILE GROUP
IMPORT & EXPORT CO., LTD.

PRESIDENT



America Strong™

July 25, 2018

Attn: China Vendors & Suppliers
至：中国大陆业务合作单位

Dear Sir/Madam,

The company, Eruption Holdings, Inc., appointed Mr. Liu, Yun (York Liu), Passport No. ED9480633, as our company's representative responsible for all business cooperation in China. Mr. York Liu is fully authorized to negotiate and execute all cooperation on behalf of the company.

本公司聘请刘云先生 (York Liu), 护照号 ED9480633, 为我方公司在中国大陆业务合作的全权代表。有权利代表本公司行使业务合作的一起权利。
特此证明。

Respectfully Yours,



Francis Liang

francis@EruptionInc.com

Tel: 626-297-8689

Eruption Holdings, Inc.

1603 Capitol Ave., Suite 314-957

Cheyenne, WY 82001

EruptionInc.com

USArmedForces.us



West Coast Distribution Center: 11135 E. Rush Street, Suite# U, South El Monte, CA 91733/Tel: 626-758-1308

EXHIBIT 2

2021/9/1

打印邮件

18

主 题:	300118ERUP05Y/300118ERUP06Y contract		
发件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	2018-11-9 14:02:44	
收件人:	Francis <francis@eruptioninc.com>		
抄 送:	YorkLiu-Sanfit <yorkliu@sanfitapparel.com>, cyliu70 <cyliu70@126.com>		
附 件:	威海纺织进出口有限公司出口合同 - FMGSP2019A-DS(2).pdf 威海纺织进出口有限公司出口合同 - FMGSP2019E-DS(1).pdf		

hi Francis,

How are you .

I send the contracts about knitting production to you as attachment . pls sign back to me and pls deliver

5 originals of the contract to my office together with the original identifications of you and York issued

by John Legge from Eruption Holding INC. I'd like to get your name card also .

My office address as bellow:

威海迪尚服装智能制造有限公司

WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编 : 264209

Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381

FAX:+86-631-5658088

MOB:18206314566

-----原始邮件-----

发件人: Francis <francis@eruptioninc.com>

发送时间: 2018-10-13 01:36:18 (星期六)

收件人: "迪尚智能制造中心 杨涛" <elain.yang@dishang.com>

抄送: YorkLiu-Sanfit <yorkliu@sanfitapparel.com>

主题: Re: 300118ERUP02Y/300118ERUP03Y/300118ERUP04Y

Hi Elain,

Well noted.

Francis

Sent from my iPhone

On Oct 12, 2018, at 3:02 AM, 迪尚智能制造中心 杨涛 <elain.yang@dishang.com> wrote:

Hi Francis ,

I have got the attached signed contracts . pls send back the signed original contracts to me . thanks !

-----原始邮件-----

发件人: Francis <francis@eruptioninc.com>

发送时间: 2018-10-12 08:20:28 (星期五)

2021/9/1

打印邮件

19

收件人: "迪尚智能制造中心 杨涛" <elain.yang@dishang.com>
抄送: 'YorkLiu-Sanfit' <yorkliu@sanfitapparel.com>
主题: Re: 300118ERUP02Y/300118ERUP03Y/300118ERUP04Y

Hi Elain,

Please see the attached signed contracts. Let me know if you need further assistance.

Best regards,
Francis/Eruption



Virus-free. www.avast.com

--
Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编: 264209
Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381
FAX:+86-631-5658088
MOB:18663127356

--
Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编: 264209
Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381
FAX:+86-631-5658088
MOB:18663127356

EXHIBIT 3

2021/9/1

打印邮件

21

主 题:	Re: UPS Package	
发件人:	Francis <francis@eruptioninc.com>	2018-12-1 10:02:06
收件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	
抄 送:	"Mark Liu" <mark70liu@163.com>	

Hi Elain,

Sorry for the late reply.

John was scheduled to come to LA office next Wednesday. Will take care of the authorization letter by then.

Our customers have delayed the payments for previous shipments (not your PO), which caused us temporary cashflow issues. I will let you the payment schedule early next week and settle your payment as priority should any payment come in first.

Please explain to your management and I apologize again for any inconvenience caused.

Wish you a nice weekend!

Best regards,
Francis

Sent from my iPhone

> On Nov 30, 2018, at 8:19 AM, 迪尚智能制造中心 杨涛 <elain.yang@dishang.com> wrote:
>
> hi Francis ,
>
> ups package I have received .but I did not see any authorization form from Eruption holdings inc.
>
> John Legge issued to you and York. Please sign the authorization form at once, scan it e-mail to me ,
>
> and send the original to my office.
>
> Thanks!
>
> another, what time you will pay for 300118ERUP01Y ? This operation makes us very unhappy .If your payment be
>
> late 3-5 days, then I can understand ,but now it's too long time, have made troubles with me . pls save it at once
>
>
>
>> -----原始邮件-----
>> 发件人: Francis <francis@eruptioninc.com>
>> 发送时间: 2018-11-21 08:23:35 (星期三)
>> 收件人: elain.yang@dishang.com
>> 抄送: "Mark Liu" <mark70liu@163.com>
>> 主题: Re: UPS Package
>>
>>
>> Hi Elain,
>>
>> The original docs was sent to you today. Please keep track of it and confirm when you receive it.
>>
>> Thank you,
>> Francis
>>
>>
>>
>>
>
>
> --
> Best Regard
>
>
>
>
> Elain Yang

2021/9/1

打印邮件

22

>
>
>
>
>
> 威海迪尚服装智能制造有限公司
> WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO., LTD
>
>
> 地址:山东省威海市高技术产业开发区恒瑞街23号 邮编: 264209
> Add.No. 23Heng Rui Street, Hig-Tech Zone, WeiHai, Shandong, China, 264209
>
>
> TEL:+86-631-5655381
> FAX:+86-631-5658088
> MOB:18663127356
>

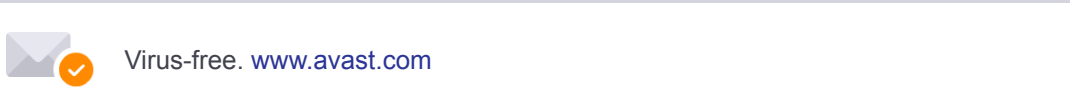
EXHIBIT 4

主 题:	Re: Authorization Letter	
发件人:	Francis <francis@eruptioninc.com>	2018-12-13 6:41:52
收件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	
抄 送:	"Mark Liu" <mark70liu@163.com>	
附 件:	Auth.ltr.weihai.pdf	

Hi Elain,

Please see the attachment. Let me know if further questions. Thanks!

Best regards,
Francis





America Strong™

December 12, 2018

Weihai Textile Group Import and Export Co., Ltd.
No. 16 Shichang Avenue, Weihai, China 264200

Re: Letter of Authorization to Act on Behalf of Eruption Holdings, Inc.

To Whom It May Concern,

I John Legge, hereby give authorization to Mr. Francis Liang, to act on my behalf, representing Eruption Holdings, Inc., in dealing of Apparel Business with China. This Authorization letter also authorizes Feimann Group, Inc., a California registered corporation to act as the handling agent for Eruption Holdings, Inc. in regard to all logistics, warehousing and payment matters.

Sincerely,

John Legge/President
Eruption Holdings, Inc.
1603 Capitol Ave., Suite 314-957
Cheyenne, WY 82001

EruptionInc.com

USArmedForces.us



West Coast Distribution Center: 11135 E. Rush Street, Suite# U, South El Monte, CA 91733/Tel: 626-758-1308

EXHIBIT 5

2021/9/1

打印邮件

27

主 题:	Re: Wire Payment - 12-12-2018.pdf
发件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com> 2018-12-13 13:08:58
收件人:	Francis <francis@eruptioninc.com>
抄 送:	"Mark Liu" <mark70liu@163.com>

hi Francis,

I have gotten your attach for payment record .But because the payment account is Feimann Group Inc., which is not the contracting party of our contract, it makes me very difficult.I will responsible to solve for the issue this time, but the next payment pls should be made by the contracting party that is Eruption Holdings,INC. This is the basic trade rule.

It is important that the balance payment should be paid within this week, instead of whenever possible. This is the ultimatum the leader gave me today.Our payment delay also makes me honored to be listed on the bulletin list of our group company, which is the top. And the manager of my branch will join me in the criticism.

In any case, please overcome the difficulties and solve them within this week, so as not to affect the several orders we are working on.

Another please send me the required shipping information via your email.Because Annie's email address was not the email address of ERUPTION HOLDINGS INC.

Please do not feel troublesome, this is the safeguard to everybody's interest.

> -----原始邮件-----

> 发件人: Francis <francis@eruptioninc.com>

> 发送时间: 2018-12-13 08:40:05 (星期四)

> 收件人: "Yang Elain" <elain.yang@dishang.com>

> 抄送: "Mark Liu" <mark70liu@163.com>

> 主题: Wire Payment - 12-12-2018.pdf

>

>

> Hi Elain,

>

> Please see the attachment. Please confirm upon receipt of the payment. Will try settle the balance not later than early next week. Thank you again for your patience.

>

> Best regards,

> Francis

>

--

Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编: 264209

2021/9/1

打印邮件

Add:No. 23Heng Rui Street, Hig-Tech Zone, WeiHai, Shandong, China, 264209

28

TEL: +86-631-5655381

FAX: +86-631-5658088

MOB: 18206314566

EXHIBIT 6

2021/9/1

打印邮件

30

主 题:	Re: Authorization letter	
发件人:	Francis <francis@eruptioninc.com>	2018-12-22 11:40:03
收件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	
抄 送:	"Mark Liu" <mark70liu@163.com>	

Hi Elain,

Mark also called me to remind me of this matter. I will send it out next Monday and provide you with the tracking number right away.

Thank you,
Francis

Sent from my iPhone

On Dec 21, 2018, at 4:40 PM, 迪尚智能制造中心 杨涛 <elain.yang@dishang.com> wrote:

resend

hi Francis ,

pls sent me the authorization letter from John Legge 's email address.

Because the previous payment situation has attracted the attention of our company's leaders, our company is more worried about the payment of future orders .In order to avoid any unnecessary trouble caused by the worry of printing our company on the back,please ask John Legge to send me the authorization letter in his email.

then pls express the signed authorization letter to my office today ,and give me the tracking number .

thanks for your cooperation .

Best regard

Elain

-----原始邮件-----

发件人: Francis <francis@eruptioninc.com>

发送时间: 2018-12-13 06:45:01 (星期四)

收件人: "迪尚智能制造中心 杨涛" <elain.yang@dishang.com>

抄送: "Mark Liu" <mark70liu@163.com>

主题: Re: Authorization letter

Hi Elain,

Please see the attachment. Let me know if you have any further questions. Thanks!

Best regards,

Francis

Virus-free. www.avast.com

2021/9/1

打印邮件

31



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Best Regard

Elain Yang

威海迪尚服装智能制造有限公司

WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编 : 264209

Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381

FAX:+86-631-5658088

MOB:18663127356

EXHIBIT 7

主 题:	Re: Re: UPS tracking for Authorization Letter		
发件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	2018-12-25 20:56:47	
收件人:	Francis <francis@eruptioninc.com>		
抄 送:	"Mark Liu" <mark70liu@163.com>		

Hi Francis ,

thanks!

> -----原始邮件-----
> 发件人: Francis <francis@eruptioninc.com>
> 发送时间: 2018-12-25 06:18:00 (星期二)
> 收件人: "Yang Elain" <elain.yang@dishang.com>
> 抄送: "Mark Liu" <mark70liu@163.com>
> 主题: Re: UPS tracking for Authorization Letter
>
>
> Hi Elain,
>
> Sent out through UPS. Here is the tracking number: 1Z7E6E090433894053
>
> Thanks,
> Francis
>
>
>
>
>
>

--
Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编: 264209
Add:No. 23Heng Rui Street, Hig-Tech Zone, WeiHai, Shandong, China, 264209

TEL:+86-631-5655381
FAX:+86-631-5658088
MOB:15588356278

EXHIBIT 8

2021/9/7

打印邮件

35

主 题:	about payment account	
发件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	2018-12-28 2:19:56
收件人:	Francis <francis@eruptioninc.com>	
抄 送:	john@eruptioninc.com, congning@dishang.com, linxuejiao@dishang.com, wangjinyan <wangjinyan@dishang.com>	

hi Francis,

I received the call from my head company office today . As the payment of 300118ERUO01Y have paid to my company by FMG's account for your company convenience .This act aroused the alarm of our financial and China credit insurance company.Because now in the international trade everyone will put risk prevention in the first place .So pls understand our fears .

Now pls confirm to me the payment of
300118ERUP02Y/300118ERUP03Y/300118ERUP04Y/300118ERUP05Y/300118ERUP06Y/300118ERUP07Y

will pay to us by your company Eruption holding inc. not others company's account .

Now our factory are shipping 300118ERUP03Y&300118ERUP04Y ,I will sent you and Annie the correct packing list details later.

But I have a bad news for you .The style NO. FMGFSP1917J/FSP1917J & FMGFSP1917X/FSP1917X goods as the washing effect are not good,

in the attitude of being responsible for you,I cannot arrange the shipment to you today .I need to return the bulk goods to the washing factory for re-work,and arrange the shipment about one week later . Pls explain to your company guest .I'm sorry for the trouble caused to you .Pls let me know if you have any problem in the future.

--

Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编 : 264209
Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381
FAX:+86-631-5658088
MOB:15588356278

EXHIBIT 9

2021/9/1

打印邮件

37

主 题:	Re: about payment account	
发件人:	Francis <francis@eruptioninc.com>	2018-12-28 8:29:54
收件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	
抄 送:	john@eruptioninc.com, congning@dishang.com, linxuejiao@dishang.com, wangjinyan <wangjinyan@dishang.com>	

Hi Elain,

Sorry for the delay payment. I discussed with John already. We will make the payment thru Eruption bank account for any outstanding balance in the future. Please don't worry about it.

Best regards,
Francis

Sent from my iPhone

On Dec 27, 2018, at 10:19 AM, 迪尚智能制造中心 杨涛 <elain.yang@dishang.com> wrote:

hi Francis,

I received the call from my head company office today . As the payment of 300118ERUO01Y have paid to my company by

FMG's account for your company convenience .This act aroused the alarm of our financial and China credit insurance

company.Because now in the international trade everyone will put risk prevention in the first place .So pls understand

our fears .

Now pls confirm to me the payment of
300118ERUP02Y/300118ERUP03Y/300118ERUP04Y/300118ERUP05Y/300118ERUP06Y/300118ERUP07Y

will pay to us by your company Eruption holding inc. not others company's account .

Now our factory are shipping 300118ERUP03Y&300118ERUP04Y ,I will sent you and Annie the correct packing list details later.

But I have a bad news for you .The style NO. FMGFSP1917J/FSP1917J & FMGFSP1917X/FSP1917X goods as the washing effect are not good,

in the attitude of being responsible for you,I cannot arrange the shipment to you today .I need to return the bulk goods to the

washing factory for re-work,and arrange the shipment about one week later . Pls explain to your company guest .I'm sorry for the

trouble caused to you .Pls let me know if you have any problem in the future.

--

Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编 : 264209
Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381
FAX:+86-631-5658088
MOB:15588356278

2021/9/1

打印邮件

38

EXHIBIT 10

2021/9/8

打印邮件

40

主 题:	Re: about deferred payment	
发件人:	"丛宁" <congning@dishang.com>	2021-3-24 8:33:52
收件人:	john@eruptioninc.com	
抄 送:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>	

Hi John ,

Nice to meet you !

This is Congning from Weihai textile group IMP & EXP CO .,LTD.

It is a long time for your company's arrears payment, and it caused a big hinder for other business development of our company .

pls arrange the paymen asap . If you have any difficults , we can consider the payment installments .

waiting for your reply promptly!

-----原始邮件-----

发件人:"迪尚智能制造中心 杨涛" <elain.yang@dishang.com>

发送时间:2020-11-17 22:53:19 (星期二)

收件人: john@eruptioninc.com

抄送: "丛总" <congning@dishang.com>

主题: about deferred payment

Hi John ,

I'm Elain from WEIHAI TEXTILE GROUPIMP& EXP CO.,LTD.

As for your company's payment arrears to our company, we have given enough time for your company's turnover.

Our company also needs funds to develop new business,which needs your understandingand support.Please pay off

the arrears of payment to our company as soon as possible,so that we can carry out a new round of business cooperation.

Best Regard

Elain Yang

威海迪尚服装智能制造有限公司

WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编 : 264209

Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381

FAX:+86-631-5658088

MOB:15588356278

2021/9/8

打印邮件

41

主 题:	about deferred payment
发件人:	"迪尚智能制造中心 杨涛" <elain.yang@dishang.com> 2021-4-15 21:58:58
收件人:	john@eruptioninc.com
抄 送:	"丛总" <congning@dishang.com>
附 件:	微信图片_20210415220201.jpg

Hi John ,

I'm Elain

Respect is mutual,my leaderand i sent you several emails,but you didn't reply. Is this a courtesy to your partner?

As my leader said that it is a long time for your company's arrears payment, and it caused a big hinder for

other business development of our company .

your company needs funds to develop new business,our company same . So Please pay off the arrears of payment to

our company as soon as possible,so that we can carry out a new business .

The other thing i want to say is that facts are always facts. Denying them doesn't change anythings .The business cooperation between your company and our company is an indisputable fact .Francis 's E-mail address as attached, in addition to your company staff and other people can also use your company domain name registration mailbox?

In addition ,there are fundstransferred directly from your company's account to our company 's account, which are sufficient to prove the existence of business cooperation between the two parties .

We just want to do business normally and don't want to cause trouble to anyone,so please cooperate well with us.

If your company is really short of funds,pls tell the credit insurance company truthfully rather than deny the transaction.Your company has admitted the existence of the business,and the credit insurance company will responsible for our company.

Pls cooperate. thanks !

Best Regard

Elain Yang

威海迪尚服装智能制造有限公司
WEIHAI DISHANG GARMENT INTELLIGENT MANUFACTURING CO.,LTD

地址:山东省威海市高技术产业开发区恒瑞街23号 邮编 : 264209
Add:No.23Heng Rui Street,Hig-Tech Zone,WeiHai,Shandong,China,264209

TEL:+86-631-5655381
FAX:+86-631-5658088
MOB:15588356278

EXHIBIT 11

Peter Geldes

Subject: RE: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

From: John Legge <john@eruptioninc.com>

Sent: Thursday, May 23, 2019 3:32 PM

To: Angela Keene <AKEene@brownandjoseph.com>

Subject: RE: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

FTC Complaint No 107575736 Francis Liang

Angela,
Please review the attached complaint with the FTC.

Respectfully,
John Legge
President/CEO

+1 307 222 8069 WY Office
+1 714 975 6909 CA Office

Eruption Holdings, Inc.
1603 Capitol Ave., Suite 314-957
Cheyenne, WY 82001

From: Angela Keene AKEene@brownandjoseph.com

Sent: Wednesday, May 22, 2019 6:36 AM

To: John Legge john@eruptioninc.com

Cc: BnJ Lawyer Lawyer@brownandjoseph.com

Subject: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

John –

Please review the attached bank slip which shows your company as the remitter. This was done as a payment test between the factory and Eruption. You indicated you had done no business with the factory. Why would you send them any money?

Our client awaits your clarification on same.

Angela Keene
Senior Account Executive

Toll Free: 800-766-4802 x
Direct: 847.621.6142
FAX: 847.758.3020



Brown & Joseph, LLC
Accounts Receivable Management Firm
Credit and Collection Specialist

One Pierce Place, Suite 1225W
Itasca, Illinois, 60143

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From: John Legge john@eruptioninc.com
Sent: Tuesday, May 14, 2019 2:19 PM
To: Angela Keene AKeene@brownandjoseph.com
Subject: RE: Sinosure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

May 14, 2019

Dear Angela Keene, here is my signature on official documents with our Corporate Seal.
Furthermore Mr. Francis Liang is not authorized or a part of Eruption Holdings Inc.
Hope this helps.

Respectfully,
John Legge
President/CEO

+1 307 222 8069 WY Office
+1 714 975 6909 CA Office



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instagram.com/eruptioninc

Eruption Holdings, Inc.
1603 Capitol Ave., Suite 314-957
Cheyenne, WY 82001

From: Angela Keene AKeene@brownandjoseph.com
Sent: Tuesday, May 14, 2019 11:38 AM

To: john@eruptioninc.com

Cc: BnJ Lawyer Lawyer@brownandjoseph.com

Subject: FW: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

Angela Keene

Senior Account Executive

Direct: 847.621.6142

Toll Free: 888.829.9997 x

From: Angela Keene AKeene@brownandjoseph.com

Sent: Friday, May 10, 2019 12:00 PM

To: francis@eruptioninc.com; gwen@eruptioninc.com; info@eruptioninc.com

Cc: BnJ Lawyer Lawyer@brownandjoseph.com

Subject: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

Please allow this correspondence to serve as notice that this firm has been retained by China Export & Credit Insurance Corporation (Sinasure) on behalf of their policy holder Weihai Textile Group Import & Export.

All further communications regarding this matter should be directed to my office.

The claimed amount of default is \$577,237.10 in which the policy holder has now filed for credit insurance due to nonpayment.

Your immediate cooperation is needed to resolve this issue out of litigation. Pursuant to the attached Trust Deeds all rights have been assigned to Sinasure to collect this on their behalf.

Your failure to cooperate may result in future import and credit implications of goods from the Peoples Republic of China.

With that being said, please review the attachments and acknowledge the invoices and amount owed of \$577,237.10 for verification purposes.

In addition, I will anticipate your payment in full via wire directly to our firms trust account. The wiring instructions are listed below. Please email me with the wire confirmation number and upon receipt I will confirm closure of this case.

Bank Name: First Midwest Bank

Bank Address: 8750 W. Bryn Mawr Avenue, Suite 1300. Chicago, IL 60631

Name on Bank Account: Brown & Joseph, LLC

Bank Account Number: 8100604977

Routing Number (ABA): 071901604

Swift Code: FMIDUS44

If you are unable to remit payment in full, you will be required to contact me directly before the end of business today to discuss a reasonable payment plan for our client to review this evening.

I look forward to your immediate response as I only have a limited time to resolve this file in my office prior to litigation.

Regards,

Angela Keene

Senior Account Executive

Toll Free: 800-766-4802 x

Direct: 847.621.6142

FAX: 847.758.3020

**Brown & Joseph, LLC**

Accounts Receivable Management Firm

Credit and Collection Specialist

One Pierce Place, Suite 1225W

Itasca, Illinois, 60143

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EXHIBIT 12

Peter Geldes

Subject: RE: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

From: John Legge <john@eruptioninc.com>

Sent: Wednesday, May 22, 2019 1:36 PM

To: Angela Keene <AKEene@brownandjoseph.com>

Subject: RE: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

Importance: High

Angela,

Please review the attached info. A deposit from the Feimann Group Inc. on 08/29/2018 for \$350.00 for the wire transfer to this account 15560114040000433 for \$300.00 plus the \$50.00 wire charge. I was told by Francis Liang if I can please help him by sending this money to his factory so he wired \$350 to my Eruption account.

I had no idea what he had done no knowledge now I understand. I never have issued any PO's to the said wire transfer company in China. Again I have no knowledge until now of any line of credit being opened under eruption's name is complete fraud. Thank you.

Respectfully,

John Legge

President/CEO

+1 307 222 8069 WY Office

+1 714 975 6909 CA Office

From: Angela Keene <AKEene@brownandjoseph.com>

Sent: Wednesday, May 22, 2019 6:36 AM

To: John Legge <john@eruptioninc.com>

Cc: BnJ Lawyer <Lawyer@brownandjoseph.com>

Subject: Sinasure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

John –

Please review the attached bank slip which shows your company as the remitter. This was done as a payment test between the factory and Eruption. You indicated you had done no business with the factory. Why would you send them any money?

Our client awaits your clarification on same.

Angela Keene
Senior Account Executive

Toll Free: 800-766-4802 x
Direct: 847.621.6142
FAX: 847.758.3020



Brown & Joseph, LLC
Accounts Receivable Management Firm
Credit and Collection Specialist

One Pierce Place, Suite 1225W
Itasca, Illinois, 60143

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From: John Legge <john@eruptioninc.com>
Sent: Tuesday, May 14, 2019 2:19 PM
To: Angela Keene <AKEene@brownandjoseph.com>
Subject: RE: Sinosure vs Eruption Inc. Balance Due: \$577,237.10 Claim # EC201904507 ^10666008/

May 14, 2019

Dear Angela Keene, here is my signature on official documents with our Corporate Seal.
Furthermore Mr. Francis Liang is not authorized or a part of Eruption Holdings Inc.
Hope this helps.

Respectfully,
John Legge
President/CEO

+1 307 222 8069 WY Office
+1 714 975 6909 CA Office



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